

## REMARKS/ARGUMENTS

Claims 1-26 remain in the application. Of these, claims 1-22 stand rejected, and claims 23-26 are new.

Support for claims 23-26 can be found, at least, on page 12, lines 2-19, and in FIG. 4, of applicant's specification. No new matter has been added.

### 1. Rejection of Claims 1-12 and 15-22 Under 35 USC 102(e)

Claims 1-12 and 15-22 stand rejected under 35 USC 102(e) as being anticipated by Lewallen (U.S. Pat. No. 6,854,123 B1).

Regarding claim 1, the Examiner asserts that Lewallen teaches:

determining whether a device interface for each of said plurality of devices conforms with a standard interface [Lewallen, determine whether a **source code statement** in an application program is a member of [a set of] standard API [interfaces], abstract];

translating said device interface to conform with said standard interface when said device interface is nonconforming [Lewallen, convert the **source code statement** to the native API, abstract];

10/13/2005 Office Action, sec. 4, p. 2 (emphasis added).

Applicant respectfully disagrees. Contrary to the Examiner's position, Lewallen fails to disclose "determining whether a **device interface** for each of said plurality of devices conforms with a standard interface", or "translating said **device interface** to conform with said standard interface when said device interface is nonconforming". See, Claim 1.

Lewallen states:

Disclosed is a system. . .for translating source code in a cross-platform computer language, such as Java, to program statements capable of executing on multiple operating system platforms. The translator programs determine whether a **source code statement** in an application program comprises an application program interface (API)

that is a member of a set of standard API interfaces, such as the API interfaces specified in the W3C DOM specification.

Lewallen, Abstract (emphasis added).

Thus, Lewallen does not determine whether **device interfaces** for **devices** conform with a standard interface (and then proceed to translate those that are non-conforming). Rather, Lewallen determines whether **source code statements** in an **“application program”** comprise APIs, and then determines whether the APIs are members of a set of standard API interfaces. Claim 1 is believed to be allowable over Lewallen’s teachings based on this difference alone (i.e., analysis of “code statements in an application program” versus analysis of “devices”).

The Examiner also asserts that Lewallen teaches:

managing said plurality of devices according to said standard interface [Lewallen, control the user interfaces that manipulate the notes, col 5 lines 1-12; col 10 lines 1-10; a file server, col 11 lines 5-22].

10/13/2005 Office Action, sec. 4, p. 3.

Applicant has reviewed Lewallen at the cited references and elsewhere. Applicant can find references to a DOM model (col. 5 lines 1-12) and specification, a W3C API interface implementation (col. 10 lines 1-10), and means to store and deliver programs (col. 11, lines 5-22). However, applicant cannot find any teaching or suggestion regarding, “managing said plurality of devices according to said standard interface”, as recited in claim 1.

Applicant’s claim 1 is believed to be allowable for at least the above reasons.

Claims 9 and 19 are believed to be allowable, at least, for reasons similar to why claim 1 is believed to be allowable. Claims 2-8, 10-12, 15-18 and 20-22 are believed to be allowable, at least, because each depends from one of claims 1, 9 or 19.

2. Rejection of Claims 13 and 14 Under 35 USC 103(a)

Claims 13 and 14 stand rejected under 35 USC 103(a) as being unpatentable over Lewallen et al. (U.S. Pat. No. 6,854,123 B1; hereinafter "Lewallen") in view of Krishnamurthy et al. (U.S. Pat. No. 6,389,464 B1; hereinafter Krishnamurthy).

Applicant's claims 13 and 14 are believed to be allowable at least for the reason that they depends from applicant's claim 9, and because Krishnamurthy does not disclose that which applicant has argued is missing from Lewallen.

3. New Claims 23-26

On December 20, 2005, applicant's representative conducted an interview with the Examiner. The purpose of the interview was to discuss how prosecution of this application, currently subject to a fourth non-final rejection due to newly cited art, could be most swiftly brought to a close. During the interview, the Examiner indicated that the embodiment represented by FIG. 4, if inserted into the base claims (1, 9 and 19), would result in the claims being allowable. Although applicant has decided against amending the base claims in this manner, applicant has presented new claims 23-26 which recite the additional limitations that the Examiner indicated would make the claims allowable.

4. Conclusion

Given the above Amendment and Remarks, applicant respectfully requests the timely issuance of a Notice of Allowance.

Respectfully submitted,  
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